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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
KIMBERLY DELL DAVIDSON-  
DROLET,  
  
Defendant.

Case No. 2:24-mj-00705-CMR  
  
SEALED FELONY COMPLAINT  
  
COUNT 1: Kidnapping. 18 U.S.C. §  
1201(a)(1)(h).  
  
Judge Dustin B. Pead

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Before the Honorable Dustin B. Pead, United States Magistrate Judge for the  
District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT 1**

On or about January 18, 2023 through June 27, 2024, in the District of Utah and  
elsewhere,

**KIMBERLY DELL DAVIDSON-DROLET,**

the defendant herein, did unlawfully kidnap, abduct, seize, confine, inveigle, decoy and carry away [REDACTED] a minor child, and in committing and in furtherance of the offense, willfully transported [REDACTED] from the State of Utah to the State of Missouri, and held [REDACTED] for ransom, reward and otherwise, by violating a custody order issued by the State of Utah, all in violation of 18 U.S.C. §1201(a)(1), (h).

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I Tyler Ketelaar, being duly sworn state the following in support of a criminal complaint:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your Affiant is a Deputy with the United States Marshals Service (DUSM) and have been since October 19,2019. I am assigned to the Salt Lake City Office, in the District of Utah. I have completed the twelve (12) week Criminal Investigator Training Program and eight (8) week Basic Deputy United States Marshal Training course at the Federal Law Enforcement Training Center in Glynco, Georgia. These courses consisted of classes in federal law, evidence handling, interviewing techniques, firearms investigations, and tactical training in the execution of search and arrest warrants. I have a total of over 12 years' experience as a law enforcement officer with 5 years as a federal law enforcement officer. While assigned to the District of Utah I have served on the Violent Fugitive

Apprehension Strike Team (VFAST) and have been involved in the capture of numerous wanted violent felons in the State of Utah including nationwide and international fugitives.

2. The information contained in this affidavit is based on information personally known to me from my work on the investigation described herein, as well as information I received from other law enforcement agents assisting in this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **PROBABLE CAUSE**

3. During January 2023, [REDACTED] parents, Kimberly Dell Davidson-Drolet and Laurence Drolet [REDACTED] were engaged in divorce and child custody proceedings in the Utah Third District Court. On or around 01/18/2023, Kimberly took [REDACTED] in violation against the custody agreement and court order. It was suspected Kimberly fled Utah with [REDACTED] and went to [REDACTED], Missouri.
4. On 02/22/2023, The Utah Third District Court issued a Writ of Assistance authorizing and directing law enforcement to take custody of [REDACTED] by any reasonable force necessary. The Writ also authorizes law enforcement to enter private property as necessary to take custody of [REDACTED] and detain anyone who interferes with the execution of the Writ.

5. On 12/20/2023, The Utah Third District Court issued a Warrant of Arrest for Kimberly Davidson Drolet for Third Degree Felony CUSTODIAL INTERFERENCE-REMOVE CHILD FROM STATE 76-5-303(2)+(3C).
6. Kimberly Davidson-Drolet unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, or carried away [REDACTED] non-custodial daughter [REDACTED] [REDACTED] was willfully transported in interstate commerce when [REDACTED] was transported by [REDACTED] older brother Jaxson Davidson, [REDACTED], and non-custodial mother Kimberly Davidson Drolet across a State boundary from Utah to Missouri where she was later located and recovered in [REDACTED] Missouri.
7. The location where [REDACTED] was discovered is a compound run by religious cult leader Paul Dean who is the founder a FLDS religious type cult. Paul Dean is the brother [REDACTED] to Kimberly Davidson- Drolet.
8. It is also suspected Kimberly Davidson- Drolet utilized the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense buy mailing letters through the United States Postal Service to her third-party sister Kristine Merrill in order to conceal her and [REDACTED] whereabouts.
9. Kimberly Davidson-Drolet also used cellular and other electronic devices that are instrumentality of interstate or foreign commerce to further conceal her and [REDACTED] whereabouts. Kimberly Davidson-Drolet and other coconspirators went through great lengths to utilize pre-paid cellular phones that were rotated regularly to prevent law enforcement interception.

10. Kimberly Davidson-Drolet's parental rights with respect to the victim child, [REDACTED], have been terminated by a court order and she has failed to appear or otherwise contact the courts since her and [REDACTED]'s disappearance in January 2023.

### CONCLUSION

11. Based on the foregoing information, your affiant respectfully requests that a complaint and warrant of arrest be issued for Kimberly Davidson-Drolet for a violation of 18 U.S.C. § 1201(a) (1), (h), Kidnapping.

Dated this 15<sup>th</sup> day of July 2024.

Respectfully submitted,



\_\_\_\_\_  
Tyler Keelmer

Deputy United States Marshal

Subscribed and sworn to before me on this 16th day of July 2024.

BY THE COURT:

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HONORABLE CECILIA M. ROMERO  
UNITED STATES MAGISTRATE JUDGE

APPROVED:

TRINA A. HIGGINS  
United States Attorney

CARLOS ESQUEDA Digitally signed by CARLOS ESQUEDA  
Date: 2024.07.16 12:19:07 -06'00'

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